

<u>Name of Plaintiff</u>	<u>Name of Defendant</u>	<u>Kind of Suit</u>
Bala Jain, LLC 6007 Marilyn Drive Alexandria, Virginia 22310	<b>EAGLE PROPERTIES AND INVESTMENTS LLC</b> 445 Windover Avenue Vienna, Virginia 22180 Serve: Monika Jain, Managing Member 445 Windover Avenue Vienna, VA 22180	The lawsuit alleges that one or more of the Defendants used money it borrowed from Bala Jain, LLC to acquire, improve, and/or develop the subject Property. The lawsuit alleges that the Defendants engaged in fraud, conspiracy to commit fraud, breach of contract, and seeks a declaratory judgment and injunctive relief establishing a constructive trust against this

		Property and such other relief as may be necessary to protect and prepare Bala Jain, LLC's interest in the Property.
	<b>MONIKA JAIN</b> 445 Windover Avenue Vienna, VA 22180	
	<b>AMIT JAIN</b> 445 Windover Avenue Vienna, VA 22180	
	<b>FIRST CLASS TITLE, INC.</b> 1803 Research Blvd, Suite 512 Rockville, Maryland 20850 Serve: Robert Kotz 11505 Hemingway Drive Reston, Virginia 20194	
	<b>Daniel Kotz, Esq.</b> 1803 Research Blvd #512 Rockville, MD 20850	

The following described real estate located at 1010 Lynn St., Vienna, VA 22180, Tax Map # 0482 03 2055, Book 25147 and Page 0897 of Fairfax County, and situated in Fairfax County, Virginia (the "Property") is involved in said suit, to-wit:

All of Lot Two Thousand, Fifty-Five (2055), Section Ten (10), Vienna Woods, as the same appears duly dedicated, platted and recorded in Deed Book 1741 at Page 322 of the land records of Fairfax County, Virginia.

Less and Except that portion of said lot conveyed to the Town of Vienna in Deed Book 1801 at Page 594 of the aforesaid county land records.

The improvements thereon commonly known as 1010 Lynn Street, SW, Vienna, VA 22180.

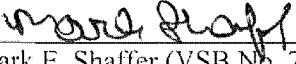
The nature of the lien, right or interest sought to be enforced is as follows: In response to Eagle

Properties and Investments, LLC's breach of the loan documents and fraud claims against its owners Amit Jain and Monika Jain, Bala Jain brings this action and asserts claims for fraud and conspiracy to commit fraud against Amit Jain, Monika Jain and Daniel Kotz; declaratory judgment and injunctive relief that Bala Jain is granted a constructive trust against the properties that Eagle Properties and Investments, LLC purchased and/or improved with a \$7.5 million loan it fraudulently obtained from Bala Jain; an accounting of the proceeds from the \$7.5 million loan Eagle Properties and Investments, LLC fraudulently obtained from Bala Jain; to disregard and pierce Eagle Properties and Investments, LLC's corporate veil; and breach of contract against Eagle Properties and Investments, LLC.

Plaintiffs claim damages of at least \$7,500,000.00, plus punitive damages and attorneys' fees.

Dated: July 20, 2022

Respectfully submitted,

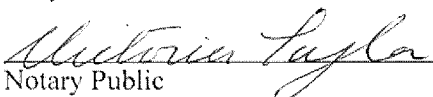
  
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Mark E. Shaffer (VSB No. 75407)  
OFFIT KURMAN  
8000 Towers Crescent Drive, Suite 1400  
Tysons Corner, Virginia 22182  
Telephone: 703.745.1820  
Facsimile: 703.745.1835  
[mark.shaffer@offitkurman.com](mailto:mark.shaffer@offitkurman.com)  
Counsel for Plaintiff Bala Jain, LLC

COMMONWEALTH/STATE OF VIRGINIA,  
COUNTY/CITY OF FAIRFAX, to-wit:

I, the undersigned Notary Public, in and for the State and County aforesaid, do hereby certify that Mark E. Shaffer, whose name is signed to the Memorandum of Lis Pendens, has acknowledged the same before me as Notary in my State and County aforesaid.

Given under my hand and seal this 20 July 2022.



  
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Notary Public

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 20 July 2022, sent by Federal Express, postage prepaid,  
a true copy of the foregoing to:

**EAGLE PROPERTIES AND INVESTMENTS LLC**

445 Windover Avenue  
Vienna, Virginia 22180

Serve:

Monika Jain, Managing Member  
445 Windover Avenue  
Vienna, VA 22180

**MONIKA JAIN**

445 Windover Avenue  
Vienna, VA 22180

**AMIT JAIN**

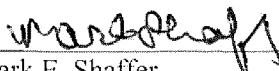
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**FIRST CLASS TITLE, INC.**

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11505 Hemingway Drive  
Reston, Virginia 20194

**Daniel Kotz, Esq.**

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Rockville, MD 20850

  
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Mark E. Shaffer